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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SEAN F. MCAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

7 UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10
11 Plaintiff,

12
13 v.

14
15 BRYCE QUINTON HALE,

16 Defendant.

1:21-CR-2052-SAB
INDICTMENT

Vios: 18 U.S.C. § 2251(a), (e):
Production of Child Pornography
(Count 1)

18 U.S.C. § 2252A(a)(2)(A), (b)(1):
Distribution of Child Pornography
(Count 2)

18 U.S.C. § 2253
Forfeiture Allegations

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18
19
20 The Grand Jury charges:

21 COUNT 1

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23 Between on or about August 2, 2021, and on or about August 6, 2021, in the
24 Eastern District of Washington, the Defendant, BRYCE QUINTON HALE, did
25 knowingly employ, use, persuade, induce, entice, and coerce Minor A to engage in
26 sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), for the purpose of
27 producing a visual depiction of such conduct, knowing and having reason to know
28

INDICTMENT - 1

1 that such visual depiction would be transported and transmitted, using any means and
2 facility of interstate and foreign commerce, and in and affecting interstate and foreign
3 commerce; such visual depiction was produced and transmitted using materials that
4 had been mailed, shipped and transported in and affecting interstate and foreign
5 commerce by any means, including by computer; and such visual depiction was
6 actually transported and transmitted, using any means and facility of interstate and
7 foreign commerce, and in and affecting interstate and foreign commerce, in violation
8 of 18 U.S.C. § 2251(a), (e).
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12 COUNT 2

13 On or about August 6, 2021, within the Eastern District of Washington, the
14 Defendant, BRYCE QUINTON HALE, did knowingly distribute child pornography,
15 as defined in 18 U.S.C. § 2256(8)(A), and that material was mailed, shipped and
16 transported in interstate and foreign commerce by any means, including by computer,
17 to wit: still image and video files depicting minor and prepubescent children engaging
18 in sexually explicit conduct, including but not limited to, the lascivious exhibition of
19 the genitals and pubic area, in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).
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23 NOTICE OF FORFEITURE ALLEGATIONS

24 The allegations contained in this Indictment are hereby realleged and
25 incorporated by reference for the purpose of alleging forfeitures.
26

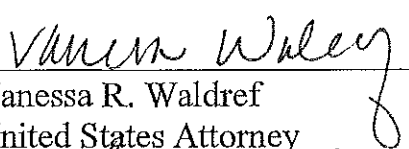
27 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense(s) in violation of
28 18 U.S.C. § 2251(a), (e); and/or 18 U.S.C. § 2252A(a)(2)(A), (b)(1), as alleged in

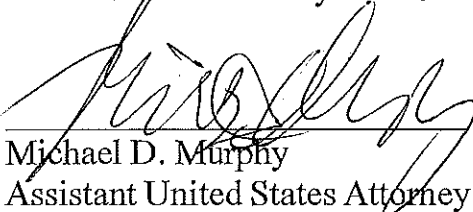
Counts 1 and 2 of this Indictment, the Defendant, BRYCE QUINTON HALE, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and, any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property, including, but not limited to:

- Quantum Fireball 3.5" hard disk drive, Serial Number 173002311914
- Quantum Fireball 3.5" hard disk drive, Serial Number 136918370881
- Toshiba Internal Disk Drive, Serial Number 855OT88LT
- White Google Pixel 3 phone.

DATED this 9th day of November 2021.

A TRUE BILL.


Vanessa R. Waldref
United States Attorney


Michael D. Murphy
Assistant United States Attorney